



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

UNDERGROUND INJECTION CONTROL PROGRAM

NOTICE OF INSPECTION

DATE: 6-11-2021

HOUR: 9:00

COMPANY NAME: PENNECO ENVIRONMENTAL SOLUTIONS, LLC
ADDRESS: 6608 ROUTE 22
DELMONT, PA 15626

INSPECTOR NAME: DAVE RECTENWALD

INSPECTOR TITLE: Environmental Scientist

INSPECTOR SIGNATURE: [Signature]

NOTICE OF INSPECTION IS HEREBY GIVEN ACCORDING TO SECTION 1445 (b) OF THE
SAFE DRINKING WATER ACT (42 U.S.C. 300 f et seq.)

REASON FOR INSPECTION:

For the purpose of inspecting records, files, papers, processes, controls and facilities, and/or obtaining samples to determine whether the person subject to an applicable underground injection control program has acted or is acting in compliance with the Safe Drinking Water (SDWA) and the Resource Conservation and Recovery Acts (RCRA) and any applicable permit or rule.

Section 1445 (b)(1) of the SDWA and RCRA *3007 (a) are quoted on the reverse side of this form.

Mechanical Integrity Test Tubing/Casing Annulus Pressure Test

U.S. Environmental Protection Agency
Underground Injection Control Program
1650 Arch Street, Philadelphia, Pa 19103-2029

EPA Witness: DAVID J. RECTENWALD Date: 06 / 11 / 2021

Test conducted by: MARC JACOBS

Others present: DON HELBURG PA DEP

Facility ID: PAS2D701BALL

Well Name: 003-21223 - SEDAT #3A Type: ER SWD Status: AC TA UC

Field: _____

Location: 40° 31' 38.5" -79° 42' 48.5"

Operator: D. MARC JACOBS, JR., SENIOR VICE PRESIDENT (724)468-8232

Last MIT: 9/23/2020 - Cement Bond Test Maximum Allowable Pressure 0 PSIG

Regularly scheduled test? ☐ Yes ☐ No
Initial test for permit? ☐ Yes ☐ No
Test after well rework? ☒ Yes ☐ No

Well injecting during test? If Yes, rate: No bpd

Pre-test annulus pressure: 0 psig

MIT DATA TABLE	Test #1	Test #2	Test #3
TUBING	PRESSURE RECORD		
Initial Pressure	<u>0</u> psig	psig	psig
End of test pressure	<u>0</u> psig	psig	psig
CASING/TUBING ANNULUS	PRESSURE RECORD		
<u>9:12</u> 0 minutes	<u>603.6</u> psig	psig	psig
5 minutes	psig	psig	psig
<u>9:21</u> 10 minutes	<u>600.2</u> psig	psig	psig
15 minutes	psig	psig	psig
<u>9:27</u> 20 minutes	<u>598.9</u> psig	psig	psig
25 minutes	psig	psig	psig
<u>9:42</u> 30 minutes	<u>595.4</u> psig	psig	psig
_____ minutes	psig	psig	psig
_____ minutes	psig	psig	psig
RESULT	<input checked="" type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail

Initial Test Pressure 603.6

Initial Test Pressure x .05 - 30.2

Results = 573.4

The Well passes Mechanical Integrity, if the final test pressure exceeds the result calculated above


Test result: **Passed** ☒ **Failed** ☐

MECHANICAL INTEGRITY PRESSURE TEST

Additional comments for mechanical integrity pressure test, such as volume of fluid added to annulus and bled back at end of test, reason for failing test (casing head leak, tubing leak, other), etc.:

REPLACED 4 1/2" INJECTION STRING AND PACKER
WITH NEW 3 1/2" TUBING SET ON PACKER AT
1875'. PASSED MIT TEST

WELL FAILED MIT ON 6-3-2021

Signature of Witness: 

OFFICE USE ONLY - COMPLIANCE FOLLOWUP

Staff _____ Date: ____/____/____

Do you agree with the reported test results? ☐ YES ☐ NO

If not, why?

Possible violation identified? ☐ YES ☐ NO

If YES, what

If YES - followup initiated? ☐ YES

☐ NO - why not?

☐ Data Entry

☐ Compliance Staff

☐ 2nd Data Entry

☐ Hardcopy Filing

Text of Section 1445 (b)(1) of the Safe Drinking Water Act

Except as provided in paragraph (2), the Administrator, or representatives of the Administrator duly designated by him, upon presenting appropriate credentials and a written notice to any supplier of water or other person subject to (A) a national primary drinking water regulation prescribed under section 1412(B), an applicable underground injection control program or (C) any requirement to monitor an unregulated contaminant pursuant to subsection (a), or person in charge of any of the property of such supplier or other person referred to in clause (A), (B), or (C), is authorized to enter any establishment, facility, or other property of such supplier or other person in order to determine whether such supplier or Other person has acted or is acting in compliance with this title, including for this purpose, inspection, at reasonable times, of records, files, papers, processes, controls, and facilities, or in order to test any feature of a public water system, including its raw water source. The Administrator or the Comptroller General (or any representative designated by either) shall have access for the purpose of audit and examination to any records, reports, or information of a grantee which are required to be maintained under subsection (a) of this section or which are pertinent to any financial assistance under this title.

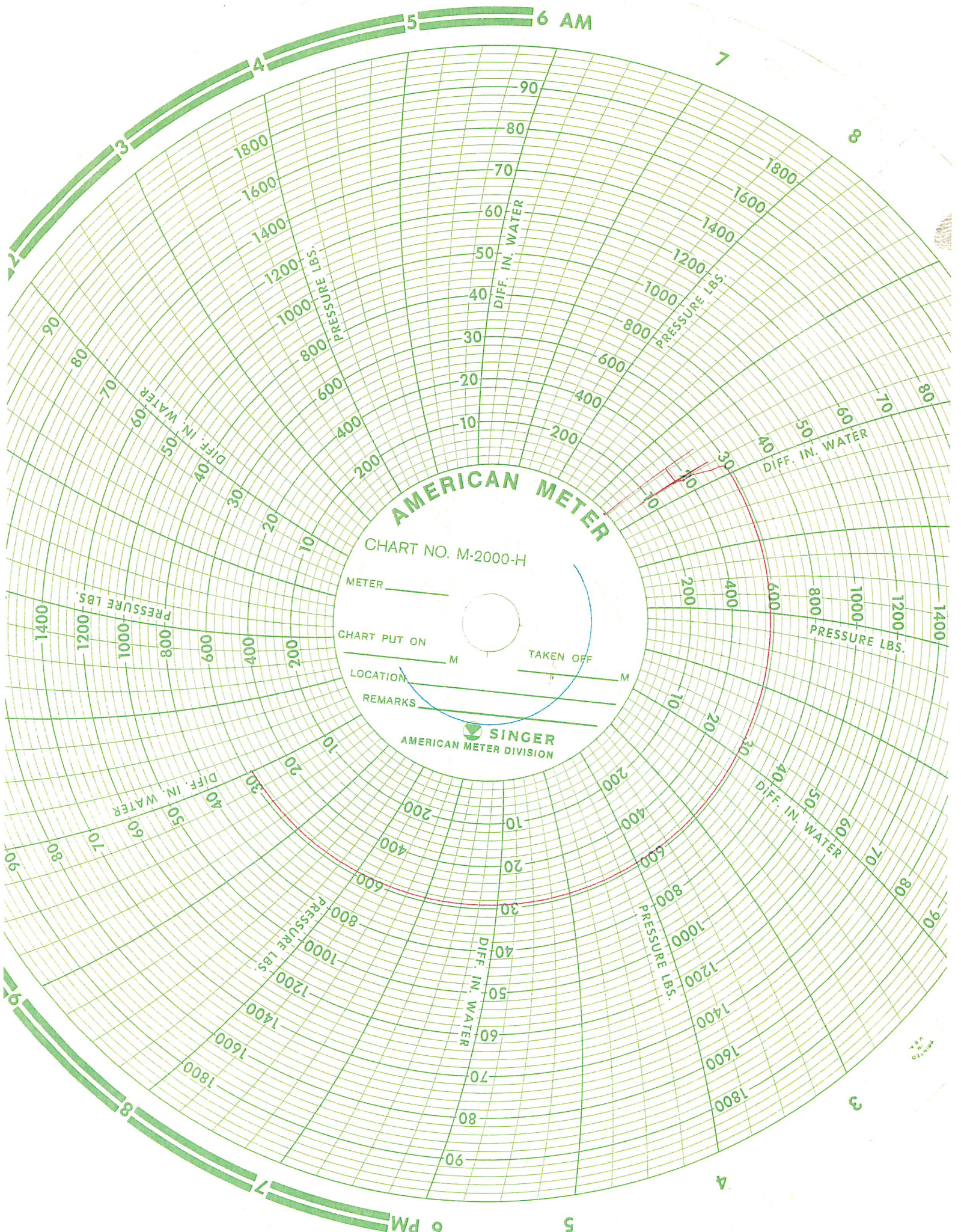
Text of Section 3007 (a) of the Solid Waste Disposal Act (as amended by Resource Conservation and Recovery Act)

For purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, or upon request of any duly designated officer, employee or representative of a state having an authorized hazardous waste program, furnish information relating to such wastes and permit such person at all reasonable times to have access to, and to copy all records relating to such wastes. For the purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, such officers, employees or representatives are authorized -

(1) to enter at reasonable times any establishment or other place where hazardous wastes are or have been generated, stored, treated, disposed of, or transported from;

(2) to inspect and obtain samples from any person of any such wastes and samples of any containers or labeling for such wastes.

Each such inspection shall be commenced and completed with reasonable promptness. If the officer, employee or representative obtains any samples, prior to leaving the premises, he shall give to the owner, operator, or agent in charge a receipt describing the sample obtained and if requested a portion of each such sample equal in volume or weight to the portion retained. If any analysis is made of such samples, a copy of the results of such analysis shall be furnished promptly to the owner, operator, or agent in charge.



AMERICAN METER

CHART NO. M-2000-H

METER _____

CHART PUT ON _____

TAKEN OFF _____

LOCATION _____

REMARKS _____



SINGER

AMERICAN METER DIVISION